

UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF WISCONSIN

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BRITTANY INEMAN, individually and on  
behalf of all others similarly situated,

Plaintiff,

Case No. 14-cv-398-wmc

v.

KOHL'S CORP.,

Defendant.

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**SUPPLEMENTAL JOINT PRELIMINARY PRETRIAL REPORT**

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WHEREAS, the parties and Court participated in a Preliminary Pretrial Conference on July 29, 2014, at which a trial date and summary judgment deadline were selected; and

WHEREAS, the Court invited the parties to submit a supplemental report outlining a schedule for other relevant pre-trial activities; and

WHEREAS, the parties have conferred and reached agreement on a schedule;

NOW THEREFORE, the parties jointly submit the following proposed schedule:

September 12, 2014	Plaintiff's Brief in Opposition to Motion to Compel Arbitration [per stipulation and Order (Dkt. 26 and 27)].
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September 26, 2014	Defendant's Brief in Reply in support of Motion to Compel Arbitration [per stipulation and Order (Dkt. 26 and 27)].
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\*\* No discovery shall occur, except discovery related to the issue of arbitrability (as agreed to by the parties), unless and until the Court denies Defendant's motion to compel arbitration.

December 19, 2014	Parties' initial disclosures due.
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January 20, 2015	Deadline for amendments to pleadings allowed without cause.
April 20, 2015	Plaintiffs' disclosure of expert witnesses (except damages and class liability experts), with reports per Rule 26(a)(2)(B).
June 1, 2015	Defense disclosure of expert witnesses (except damages and class liability experts) with reports per Rule 26(a)(2)(B).
June 29, 2015	Plaintiff's expert rebuttals due, if any.
July 8, 2015	Deadline for class certification motion.

Opposition to class certification motion shall be due within 30 days of the filing of the moving papers; replies shall be filed within 21 days of the opposition.

**\*\*Defendant reserves the right to object to discovery requests seeking the production of records/data related to the entire class on the basis that such records/data are not or will not become relevant unless and until a class is certified.**

Plaintiff, on the other hand, does not believe that any such "class" versus "merits" restrictions should be placed on discovery in the abstract, and that any such considerations should be addressed, if at all, on a request-by-request basis.

November 13, 2015	Deadline for filing dispositive motions.
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Oppositions to dispositive motions shall be due within 30 days of the filing of the moving papers; replies shall be filed within 21 days of oppositions.

January 18, 2016	Plaintiffs' disclosure of damages and class liability expert witnesses, with reports per Rule 26(a)(2)(B).
February 15, 2016	Defendant's disclosure of damages and class liability expert witnesses, with reports per Rule 26(a)(2)(B).
February 29, 2016	Plaintiff's damages and class liability expert rebuttals due, if any.
March 28, 2016	Close of discovery.
May 16, 2016	Trial.

Dated: August 5, 2014

KELLEY DRYE

By: /s/ Lauri Mazzuchetti (per email authorization 8/5/14)

Lauri Mazzuchetti

Email: lmazzuchetti@kelleydrye.com

Joseph Boyle

Email: jboyle@kelleydrye.com

200 Kimball Drive

Parsippany, NJ 07054

Telephone: (973) 503-5900

Facsimile: (973) 503-5950

*Attorneys for Defendant Kohl's Corporation*

Respectfully submitted,

MEYER WILSON CO., LPA

By: /s/ Matthew R. Wilson

Matthew R. Wilson

Email: mwilson@meyerwilson.com

Michael J. Boyle, Jr.

Email: mboyle@meyerwilson.com

1320 Dublin Road, Ste. 100

Columbus, Ohio 43215

Telephone: (614) 224-6000

Facsimile: (614) 224-6066

CULLEN WESTON PINES & BACH LLP

Lester A. Pines, SBN 1016543

Email: pines@cwpb.com

Tamara B. Packard, SBN 1023111

Email: packard@cwpb.com

122 West Washington Avenue, Suite 900

Madison, WI 53703

Telephone: (866) 443-8661

Facsimile: (608) 251-2883

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Daniel M. Hutchinson

Email: dhutchinson@lchb.com

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

Telephone: 415.956.1000

Facsimile: 415.956.1008

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Jonathan D. Selbin

Email: jselbin@lchb.com

Douglas I. Cuthbertson

Email: dcuthbertson@lchb.com

250 Hudson Street, 8th Floor

New York, NY 10013

Telephone: (212) 355-9500

Facsimile: (212) 355-9592

*Attorneys for Plaintiff Brittany Ineman  
and the Proposed Class*